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Attorneys for Defendant  
COUNTY OF SANTA CLARA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

BLAS DAVID GRACIA, et al.,	)	No. C06-00421 HRL
Plaintiffs,	)	
v.	)	<b>STIPULATION AND PROTECTIVE</b>
COUNTY OF SANTA CLARA,	)	<b>ORDER (AS MODIFIED BY COURT)</b>
Defendants.	)	

Plaintiffs BLAS DAVID GRACIA, in his individual and representative capacities, FLORENTINO GRACIA-MORALES and MARIA ELENA AGUILAR-SAUCEDO (collectively "Plaintiffs"), and Defendant COUNTY OF SANTA CLARA (hereafter "County") stipulate to the following terms and conditions respecting specifically designated and/or marked documents and items produced in this litigation by the County, from and after May 30, 2006, in response to Plaintiffs' discovery requests:

1. It is agreed that Plaintiffs will restrict access to all documents and items - marked "DOC CONFIDENTIAL" by the County, and all information contained therein - to the following individuals: each named Plaintiff, Plaintiffs' attorneys (including staff), ~~and~~ litigation consultants, and witnesses per paragraph 3;

2. Nothing contained herein shall prohibit counsel for the Plaintiffs and the County from using or referring to the marked documents or items in motion papers or pleadings filed

1 with the Court in this action. If marked documents or items subject to this protective order are  
 2 contained within or attached to any pleading, the County will have the right to move that any  
 3 pleading be sealed pursuant to Court Order;

4 3. Where permitted by the rules of evidence, the marked documents or items may  
 5 be exhibited to witnesses during the trial or pretrial proceedings in this action provided,  
 6 however, that to the extent that the transcript of any trial or pretrial proceeding or the exhibits  
 7 thereto incorporate or reference the documents or items, such transcript and any such exhibits  
 8 may be sealed in accordance with the Court's rules and procedures upon application therefore  
 9 by the County;

10 4. Upon case disposition, Plaintiffs agree to dispose of all of the documents and  
 11 items (and all duplicates and/or copies thereof) or return same to the County;

12 5. If there is any unauthorized disclosure of any documents or items subject to this  
 13 Order by any person or entity, said person or entity may be subject to sanctions and civil  
 14 contempt for violation of this Order, in accordance with the procedures of the Court; and

15 6. This Order is subject to modification pursuant to written stipulation between the  
 16 parties and/or appropriate motion procedures.

17 Dated: September 15, 2006

By:



HECTOR SALITRERO  
Attorneys for Plaintiffs

19 Dated: September 15, 2006

ANN MILLER RAVEL  
County Counsel

By:



DAVID M. ROLLO  
Deputy County Counsel

Attorneys for Defendant  
COUNTY OF SANTA CLARA

24 PURSUANT TO STIPULATION, IT IS SO ORDERED:

25 Dated: 11/16/06



JUDGE HOWARD R. LLOYD  
U.S. Magistrate Judge

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